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December 10, 2019

## MEMO ENDORSED

VIA ECF

The Honorable Ona T. Wang, U.S.M.J.  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: Michael Gaffney v. Muhammad Ali Enterprises LLC., et al**  
**Civil Action No.: 18-CV-08770**

Dear Judge Wang:

This firm represents the Plaintiff in the above-entitled action. There is a settlement conference currently scheduled for December 18, 2019 (Docket Entry #24). I spoke to counsel about the viability of going forward with the settlement conference next week in light of the fact that although the parties have exchanged information, Plaintiff's expert has advised me that he still does not have enough information to complete a damages analysis. Without this analysis, Plaintiff is unable to even calculate a proper demand. Additionally, Plaintiff is in the process of engaging Robert Allen, Esq. of the law firm Glaser Weil to assist in the prosecution of this claim. Mr. Allen has just been retained and his presence at the settlement conference would certainly be helpful in potentially resolving this matter.

In light of the above, the parties respectfully request an adjournment of the December 18, 2019 settlement conference as not to waste the court's or the parties' time. Should Your Honor grant the adjournment, the parties will continue to exchange information pending the next settlement conference date.

We thank you for Your Honor's time and attention to this matter.

Very truly yours,

*/s/ Jack T. Spinella*

Jack T. Spinella

Cc: (all counsel & Judge Batts via ECF)

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**Application GRANTED in part.** The December 18, 2019 settlement conference will be converted to a settlement status call. Please call 212-805-0260 at 10:00 a.m. when all counsel are on the line.  
**SO ORDERED.**

Ona T. Wang 12/11/19  
U.S. Magistrate Judge